

September 1, 2021

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

FILED
U.S. BANKRUPTCY COURT
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SD OF N.Y.

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In re : Chapter 11
PURDUE PHARMA L.P., *et al.*,¹ : Case No. 19-23649 (RDD)
Debtors : Jointly Administered
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**OBJECTION TO (I) ELEVENTH AMENDED JOINT
CHAPTER 11 PLAN OF PURDUE PHARMA L.P. AND ITS
AFFILIATED DEBTORS, AND (II) ANY PROPOSED
CONFIRMATION ORDER**

**TO: THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE:**

Vitaly Pinkusov, an unsecured nonconsensual third-party creditor/claimant of the Sackler Family, Purdue Pharma L.P., and its other affiliated debtors, hereby submits this objection (the

¹ The "Debtors" in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

“Objection”) to the Eleventh Amended Joint Chapter 11 Plan of Purdue Pharma L.P., and its Affiliated Debtors (the “Eleventh Amended Plan”) dated August 31, 2021 (ECF No. 3706), and hereby reaffirms his previous objection (the “Original Objection”) dated August 25, 2021 (ECF No. 3677), and incorporates it here by reference, and hereby joins William K. Harrington, the United States Trustee for Region 2 (the “United States Trustee”) in his Supplemental Objection of United States Trustee to (I) Eleventh Amended Joint Chapter 11 Plan of Purdue Pharma L.P. and Its Affiliated Debtors, and (II) Any Proposed Confirmation Order (the “United States Trustee Objection”) dated August 31, 2021 (ECF No. 3710) and incorporates it here by reference and states:

OBJECTION

A. The Eleventh Amended Joint Chapter 11 Plan of Purdue Pharma L.P. And its Affiliated Debtors

Vitaly Pinkusov objects to the Eleventh Joint Plan. Vitaly Pinkusov previously objected to the Ninth Amended Joint Chapter 11 Plan of Purdue Pharma L.P. and its Affiliated Debtors (ECF No. 3677). Vitaly Pinkusov hereby incorporates herein any and all arguments raised in his previously filed Objection to the Ninth Amended Plan.

Specifically, Vitaly Pinkusov continues to object to the confirmation of the Plan because of two impermissible and supremely unjust provisions: (1) the extraordinarily broad nonconsensual third-party release of the infamous Sackler Family and other non-debtors by extinguishing the non-debtors direct claims against them; and (2) the payment of no less than \$500 million in the attorneys' supremely shameless and exaggerated fees under Section 5.8 without any reasonable Court oversight and approval or the opportunity for parties to object as required by Section 503(b)(4) of the Bankruptcy Code. Therefore, the Eleventh Amended Plan cannot and should not be confirmed for obvious reasons.

Additionally, Vitaly Pinkusov, continues to support and reiterate all the arguments previously raised by the United States Trustee in Part A of his Supplemental Objection of United States Trustee to (I) Eleventh Amended Joint Chapter 11 Plan of Purdue Pharma L.P and Its Affiliated Debtors, and (II) Any Proposed Confirmation Order (the "United States Trustee Objection") dated August 31, 2021 (ECF No. 3710) and incorporates it here by reference.


B. **The Confirmation Order**

Additionally, Vitaly Pinkusov, continues to support and reiterates all the arguments raised by the United States Trustee in Part B of his Supplemental Objection of United States Trustee to (I) Eleventh Amended Joint Chapter 11 Plan of Purdue Pharma L.P and Its Affiliated Debtors, and (II) Any Proposed Confirmation Order (the "United States Trustee Objection") dated August 31, 2021 (ECF No. 3710) and incorporates it here by reference.

CONCLUSION

Therefore, Vitaly Pinkusov respectfully submits this Objection and respectfully requests that the Court would sustain this Objection of Vitaly Pinkusov and any other Objections, including the Objection of the United States Trustee, who in his capacity of the United States Trustee courageously represents the interests of the United States and courageously defends the interests of the 65,678,394 United States citizens, who are also citizens of California, Connecticut, Delaware, Maryland, New Hampshire, Oregon, Rhode Island, Vermont, Washington, and District of Columbia, and other filed Objections of other similar suffering nonconsensual third-party claimants, and that the Court would grant such relief as is just to these countless claimants affected by the Great Opioid Epidemic that has killed over 500,000 innocent Americans, including Vitaly Pinkusov's late wife, Elina Goldovsky.

Respectfully submitted,

A handwritten signature in cursive script, reading "Vitaly Pinkusov", written in black ink.

Vitaly Pinkusov
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